

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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L. TODD DIORIO, JEFFREY DIORIO, DEAN  
TAMBURRI, GENARO A. ARGENIO, MICHAEL  
MASTROPIETRO AND JUSTIN DARROW, AS  
THE TRUSTEES AND FIDUCIARIES OF THE  
LABORERS' LOCAL NO. 17 DEFINED  
CONTRIBUTION FUND, THE LABORERS' LOCAL  
NO. 17 HEALTH CARE FUND, THE LABORERS  
LOCAL NO. 17 TRAINING FUND, THE  
LABORERS LOCAL NO. 17 SUPPLEMENTAL  
UNEMPLOYMENT FUND, THE LABORERS  
LOCAL NO. 17 LABORERS-EMPLOYERS  
EDUCATION AND COOPERATION TRUST FUND  
AND THE LABORERS LOCAL UNION NO. 17,

Plaintiffs

-against-

CASA BUILDERS, INC. d/b/a FRIEDLANDER  
CONSTRUCTION and WOODLAND  
UNDERGROUND LLC d/b/a FRIEDLANDER  
CONSTRUCTION

Defendants.  
-----X

TO: RUBY J. KRAJICK, CLERK OF COURT  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Plaintiffs, L. Todd Diorio, Jeffrey Diorio, Dean Tamburri, Genaro A.  
Argenio, Michael Mastropietro and Justin Darrow, as Trustees and Fiduciaries of  
the Laborers' Local No. 17 Defined Contribution Fund, the Laborers' Local No. 17  
Health Care Fund, the Laborers Local No. 17 Training Fund, the Laborers Local  
No. 17 Supplemental Unemployment Fund, and the Laborers Local No. 17  
Laborers-Employers Education and Cooperation Trust Fund, pursuant to Fed. R.

Civil Action No.:

7:21-cv-01863-VB

REQUEST FOR ENTRY  
OF DEFAULT

Civ. P.55(a), against all Defendants in this lawsuit for their failure to appear or otherwise respond to the Complaint within the time specified by the Federal Rules. On April 29, 2021, the Complaint, Summonses and all other initiating documents in this lawsuit were served personally on John Doe, name refused, of Casa Builders, Inc. On April 2, 2021, the Complaint, Summonses and all other initiating documents in this lawsuit were served personally on Kay Secunda, office worker of Woodland Underground LLC. A declaration of service, certifying that the forgoing service was completed, was filed with the Court on May 5, 2021. More than 21 days have elapsed since service was performed. The Defendants have not been granted any extension of time to respond to the Complaint. Defendants have failed to answer or otherwise respond to the Complaint, or serve any answer or other response on Plaintiffs' attorney of record.

A proposed Certificate of Default is submitted herewith for the Court's convenience.

THE PLAINTIFFS  
Respectfully submitted,

/s/ Gregory S. Campora  
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Dated: June 1, 2021

**CERTIFICATION**

I hereby certify that, on June 1, 2021, a copy of the foregoing Request for Entry of Default was filed electronically and served by mail on anyone unable to accept electronic filing (as listed below). Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

CASA BUILDERS, INC.  
171 Main St.  
New Paltz, New York, 12561

WOODLAND UNDERGROUND LLC  
64 N Putt Corners Road  
New Paltz, New York, 12561

/s/ Gregory S. Campora  
Gregory S. Campora, Esq.